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Food Safety And Inspection Service
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AUDIT REPORT FOR ARGENTINA
MARCH 27 THROUGH APRIL 19, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Argentina's meat inspection system from March 27 through April 19, 2001. Eight of the thirty-five establishments certified to export meat to the United States were audited. Four of these were slaughter establishments; the other four were conducting processing operations.

The last audit of the Argentinean meat inspection system was conducted in March 2000. Eight establishments were audited and all were acceptable. These were Establishments 2062, 13, 1373, 89, 249, 1378, 1921, and 1113. Sanitation Standard Operating Procedures (SSOP) and Hazard Analysis and Critical Control Point (HACCP) systems were in place and functioning properly with only minor variations observed. Testing procedures for generic *Escherichia coli* and *Salmonella* were also in place and functioning properly.

Cooked frozen beef, shelf stable canned beef, and cooked pork are eligible for export to the United States, but no fresh product is eligible at this time because of the outbreak of foot and mouth disease in areas of Argentina.

During calendar year 2000, Argentinean establishments exported nearly 88 million pounds of beef to the U.S. Port-of-entry rejections were for miscellaneous defects (0.043%), contamination (0.12%), unsound (0.13%), and transportation damage and missing shipping marks (0.33% combined).

PROTOCOL

This on-site audit was conducted in five parts. One part involved visits with Argentinean national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second part entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. Establishments were selected by looking at previous audits, looking at the import records and determining the establishments with high rejects at the border, and some were selected randomly. The third part was conducted by on-site visits to establishments. The fourth part was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella* and generic *E. coli.* The fifth part was a visit to a farm/feedlot to look at the use of chemicals and drugs and look at their records concerning withdrawal periods before slaughter eligibility.

Program effectiveness determinations focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species. Argentina's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Based on the performance of the individual establishments, Argentina's "In-Plant Inspection System Performance" was evaluated as In-Plant System Controls In Place.

Effective inspection system controls were found to be in place in all of the eight establishments audited; two establishments (Ests. 2067 and 2062) were recommended for re-review as they were deficient in some aspects of establishment controls. Establishment 2062 deficiencies were: condensate dripping onto exposed carcasses in the cooler, pre-boning trim was not effective allowing hair and rail residues on the product on the boning table, and the moving viscera table had residues from previous use. Establishment 2067 deficiencies were: heavy condensate above exposed carcasses in the cooler, pre-boning trim was not effective allowing hair and rail residues on the product on the boning table, and residues of the previous day's uses were found on boning table, liver skinner, metal product scoops and a hopper-grinder all ready for use. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

Entrance Meeting

On March 27, an entrance meeting was held at the Buenos Aires offices of the Servicio Nacional de Sanidad y Calidad Agroalimentaria (SENASA), and was attended by Dr. Eduardo Cohen Arazi, National Director of Agrifood Inspection; Dr. Gustavo Queirolo, Director of International Relationships; Dr. Andres Schnöller, Director of Inspection of Animal Products; Dr. Oscar Lernoud, United States Export Coordinator and Dr. M. Douglas Parks, USDA International Audit Staff Officer.

Topics of discussion included the following:

1. The itinerary for audit and establishment substitutions. It was necessary to change some on-site audits due to plant closures.

2. A request was given for the country profile to be completed and brought up to date.

3. A discussion and information requested about the status and geographic areas with Foot and Mouth Disease and the quarantine areas.

4. Laboratory audits were discussed and scheduled.

5. Enforcement activities for the year past were discussed.

6. An on-site visit to a farm or feed lot was discussed and scheduled.

7. The residue-sampling program and questionnaire were discussed.

8. The exemption for species testing was discussed. I explained the delay of a decision.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Argentina's inspection system in March 2000.
To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters of the inspection service. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOP, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.

- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

No concerns arose as a result of the examination of these documents.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Argentina as eligible to export meat products to the United States were full-time SENASA employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Thirty-five establishments were certified to export meat and meat products to the United States at the time this audit was conducted. Eight establishments were visited for on-site audits. In all of the eight establishments visited, both SENASA inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited, approved, and private laboratories
2. Intra-laboratory quality assurance procedures, including sample handling.
3. Methodology.

The Official SENASA Laboratory in Martinez was audited on April17, 2001. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done. The check sample program met FSIS requirements.

Argentina's microbiological testing for *Salmonella* was being performed in approved private and government laboratories. In addition to the Official SENASA Laboratory, one of the private approved laboratories, the Xenobioticos S.R.L. in Buenos Aires was audited. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories were accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.

2. The laboratories had properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses were being reported to the government or simultaneously to the government and establishment.

Farm/Feedlot Visit

Las Mercedes Feedlot
San Pedro Department
Santa Lucia, Buenos Aires (Province)

This feedlot was visited on April 11, 2001 to obtain information about drug, pesticide, disinfectant and other chemicals usage. This included products used, treatment schedules, frequency of usage, and withdrawal periods and how these are maintained. It was found that all of these activities were done according to manufacturer's recommendations. All incoming vehicles are sprayed with a viricide (Virkon-S) and personnel must walk through a footbath of this substance upon entering and leaving the premises. All facilities of the feedlot are sprayed with Virkon-S every 15 days. Records were kept of individual animals with identification to assure the withdrawal periods for drug residues were properly observed. There were discussions about these matters with the local SENASA Officials and with the private veterinarian employed by the feedlot.

Establishment Operations by Establishment Number

The following operations were being conducted in the eight establishments:

Beef slaughter and boning – two establishments (1970 and 1989)
Beef slaughter, boning and canning – one establishment (2067)
Beef slaughter, boning and cooked frozen beef – one establishment (2062)
Beef boning only – four establishments (267, 2676, 2629, and 1067)

SANITATION CONTROLS

Based on the on-site audits of establishments, Argentina's inspection system had controls in place for SSOP, according to the criteria employed in the U.S. domestic inspection program with minor variations. The variations included dirty viscera pans returned for use (Ests. 2062 and 1989); condensate above exposed product or exposed product trafficways (Ests. 2629, 1970, 2067 and 2062); poor dressing procedure and ineffective trimming at the pre-boning trim station (Ests.2067 and 2062); residues from previous day's use on equipment ready for use (Ests.2062, 2067, 1970, 1067 and 2676).

These deficiencies were all corrected immediately by inspection and company personnel.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were audited and found to meet the basic FSIS regulatory requirements with only occasional minor variations. These variations included no preventative action recorded (Ests. 2629, 267, 1067, 1970, 1989, 2067 and 2062); the plan was not signed and dated by the person with overall authority (Ests.1989 and 2629); operational sanitation was not addressed in the plan however it was being conducted (Ests. 267 and 2067). In all cases commitments were made by management personnel to correct these problems.

Facilities and Equipment

In Establishment 2062, condensation was dripping onto carcasses in the carcass cooler from overhead structures that were not cleaned and sanitized daily. The inspection service detained and had them moved and reconditioned immediately.

Humane Slaughter

There were multiple hits with a captive bolt pistol for stunning on the animals in Establishment 1989. There were up to three hits on over 80% of the animals. The inspection service veterinarian immediately had the company supervisor correct the situation.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations. These minor variations were: in Establishment 267, there was no designated CCP, however there were limits in place; in three establishments (Ests. 267, 2067 and 2062), verification procedures were absent or only a single procedure was listed; in four establishments (Ests. 1970, 2676, 2629 and 2067), pre-shipment review was either absent or incomplete; and in two establishments (Ests. 1989 and 2067), deviations were noted in a CCP but no corrective action was taken.

Testing for Generic *E. coli*

Four of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing and were evaluated according to the criteria employed in the U.S. Domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were audited and found to meet the basic FSIS regulatory requirements with only occasional minor variations.

Testing for *Salmonella* Species

Four of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Argentina has adopted the FSIS regulatory requirements for *Salmonella* testing.

The *Salmonella* testing program was found to meet the basic FSIS regulatory requirements with only occasional minor variations. These variations included: in Establishment 2067, the bin of ground beef for sampling was not selected randomly and the product sampled was trimmings and not ground beef; and in Establishment 2062, the ground beef being sampled was not selected randomly.

ANIMAL DISEASE CONTROLS

Argentina's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product. This includes visual examination of all feet and lips of all slaughtered animals at the time of slaughter for signs of Foot and Mouth Disease.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

There have been severe outbreaks of Foot and Mouth Disease in Argentina in several provinces since the last audit. There have been nearly 300 outbreaks but they have been slowing since March 2001. These provinces or states are as follows:
Buenos Aires
La Pampa
Cordoba
San Luis
Entre Rios

Vaccinations have been undertaken in these states at the present time. This is a killed vaccine. Field samples are periodically being sent to the United States APHIS laboratory at Plum Island for confirmation and the type is 01 Campo. These outbreaks have resulted in the closure and/or severe cutback in operations in several export establishments.

RESIDUE CONTROLS

Argentina's National Residue Testing Plan for 2001 was being followed and was on schedule. The Argentinean inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The Argentinean inspection system had controls in place to ensure adequate control in the slaughter and processing departments except for minor variations. These variations included: in Establishment 1970, all inspection legend brands were illegible; and in Establishments 2067 and 2062, dressing procedures were not adequate to prevent the presence of all foreign material on the carcasses, and pre-boning trim was not effective resulting in product on the boning table with foreign material present (this material was hair, grease and metal particles from the conveyor rail). These variations were corrected by the inspection and company personnel.

Additionally, establishments had adequate controls in place to prevent meat products intended for Argentinean domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

The SENASA inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Species Verification Testing

At the time of this audit, Argentina was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements. Argentina has applied for exemption of species testing but had not received permission at this time.

Monthly Reviews

These reviews were being performed by the Argentinean equivalent of Area Supervisors. All were veterinarians with many years of experience. Dr. Andres Schnöller is in charge of the slaughter and processing establishments, Dr. Eduardo Cohen Arazi in charge of the Agrifood inspection, and Dr. Oscar Lernoud is the Coordinator of Exportation to the United States.

The internal review program was not applied equally to both export and non-export establishments. Internal review visits were sometimes announced in advance by hours or a day or two to inspection personnel only, and were conducted at times by individuals and at other times by a team of reviewers. These reviews are conducted at least once monthly, and sometimes two or three times within a month. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central SENASA offices in Buenos Aires, and were routinely maintained on file for a minimum of three years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, a commission is empowered to conduct an in-depth review, and the results are reported to Drs. Cohen Arazi and Schnöller for evaluation; they formulate a plan for corrective actions and preventive measures.

Enforcement Activities

Compliance and enforcement activities during the year 2000 for violations of the standards regulating the health and quality of products, by-products and derivatives of animal origin are detailed below.

Rulings were issued on two hundred and fifty-nine (259) cases involving violations of Decree 4238/88 which establishes the set of standards to which nationally qualified plants devoted to preparing animal origin products by-products, and derivatives. This Agency (SENASA) applied the sanctions envisioned in Decree 1685/96 and its modification, which consist of warning, fines of up to one million pesos, suspension for up to a year, cancellation of registration, temporary or final plant closure and confiscation of product, by-products and /or things related to the violation that was committed in these cases. In compliance with the National Plan for the Health and Hygiene Control of Chemical Wastes in Animal-Origin Products, By-Products and Derivatives intended for products of human consumption, created through Resolution 215 of SENASA, rulings were issued in thirty-five (35) cases. Likewise, the measures to suspend registration, authorization, permit certification and/or provision of service contemplated in Resolution 709 of the Secretary of Agriculture, Livestock, Fishing and Food were applied to those persons who for any reason had debts to this National Office until such time as they corrected the situation.

Exit Meeting

An exit meeting was conducted in Buenos Aires on April 19, 2001. The Argentinean participants were: Dr. Alfredo Bigatti, SENASA Vice President; Dr. Eduardo Cohen Arazi, National Director of Agrifood Inspection; Dr. Andres Schnöller, Director of Inspection of Animal Products; Dr. Oscar Lernoud, United States Export Coordinator; Dr. Jorge Rodríguez Toledo, Animal Laboratory Director; Dr. Aldo Combessies, Laboratory Director; Dr. Guillermo Coll, Pampas Area Director; Lic.Gustavo Queirolo, International Relationship; Dr. Roxana Blasetti, International Relationship Coordinator and Dr. M. Douglas Parks, USDA International Audit Staff Officer.

The following topics were discussed:

1. Ratings of establishments and deficiencies. The deficiencies were discussed in depth. They were: (a) Humane stunning and the need to have well trained personnel in this position and the importance of careful and accurate placement of the stun gun. Inspection officials were quick and with emphasis to assure that this matter had been addressed in the establishment where the variation occurred and would be monitored closely in the future, and (b) In Establishment 2062, condensation was observed dripping onto exposed carcasses in the cooler, the pre-boning trim was not effective allowing hair and rail residues on the product on the boning table and the moving viscera table was coming up with residues from the previous use. In Establishment 2067, heavy condensation was observed above exposed carcasses in the cooler, pre-boning trim was not effective allowing hair and rail residues on the product on the boning table and residues of previous day's uses were observed on the boning table, liver skinner, metal product scoops and a hopper-grinder all ready for use. Assurances were given by inspection officials that these situations had been corrected and would be monitored closely in the future.

2. Compliance and enforcement. We discussed the fact that people convicted of a felony meat violation would be allowed to reenter the meat business when their debt to society had been paid (fine or incarceration).

3. Animal diseases. FMD was discussed with reference to geography of the outbreaks, vaccination, quarantine areas, plant closures and future actions.

4. Laboratories. The audit results, procedures, and where *Salmonella* testing is conducted.

5. Farm/feedlot audit. Audit results revealed a minor variation in the records of accurate animal treatment dates. Commitments were made by the inspection officials to assure that these dates would be accurate in the future.

6. Species testing. The Argentinean officials are awaiting permission to stop the testing.

7. The current residue questionnaire was discussed and given to the auditor.

CONCLUSION

The inspection system of Argentina was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Eight establishments were audited: six were acceptable, and two were evaluated as acceptable/re-review. The deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction.

Dr. M. Douglas Parks
International Audit Staff Officer

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ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing.
D. Data collection instrument for *Salmonella* testing
E. Laboratory audit form
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report (no comments received)

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
267	√	√	no	√	√	√	√	√
1970	√	√	√	√	√	√	√	√
1989	√	√	√	√	√	√	√	no
2676	√	√	√	√	√	√	√	√
2629	√	√	√	√	√	√	√	no
2067	√	√	no	√	√	√	√	√
1067	√	√	√	√	√	√	√	√
2062	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

152	√	√	√	√	√	√	√	√
391	√	√	√	√	√	√	√	√
1014	√	√	√	√	√	√	√	√
1113	√	√	√	√	√	√	√	√
1122	√	√	√	no	√	√	√	√
1237	√	√	√	√	√	√	√	no
1373	√	√	√	√	√	√	√	√
1399	√	√	√	√	√	√	√	√
2035	√	√	√	√	√	√	√	√
2064	√	√	√	√	√	√	√	√
2065	√	√	√	√	√	√	√	√
2082	√	√	√	√	√	√	√	√

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. *The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.*
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10.Adequate verific. procedures	11.Adequate documentation	12. Dated and signed
267	√	√	√	√	√	no	√	√	√	no	√	√
1970	√	√	√	√	√	√	√	√	√	√	√	√
1989	√	√	√	√	√	√	√	√	√	√	√	√
2676	√	√	√	√	√	√	√	√	√	√	√	√
2629	√	√	√	√	√	√	√	√	√	√	√	√
2067	√	√	√	√	√	√	√	no	√	no	√	√
1067	√	√	√	√	√	√	√	√	√	√	√	√
2062	√	√	√	√	√	√	√	√	√	no	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

152	√	√	√	√	√	√	√	√	√	no	√	√
391	√	√	√	√	√	√	√	no	√	√	√	√
1014	√	√	√	√	√	√	no	no	√	√	√	√
1113	√	√	√	√	√	√	√	√	√	√	√	√
1122	√	√	√	√	√	√	√	no	√	√	√	no
1237	√	√	√	√	√	√	√	√	√	√	√	√
1373	√	√	√	√	√	√	√	√	√	√	no	√
1399	√	√	√	√	√	√	√	√	√	√	√	√
2035	√	√	√	√	√	√	√	√	√	√	√	√
2064	√	√	√	√	√	√	√	no	√	√	√	no
2065	√	√	√	√	√	√	√	√	no	√	√	√
2082	√	√	√	√	√	√	√	no	√	√	no	√

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
267	N/A									
1970	√	√	no	√	√	√	√	√	√	√
1989	√	√	√	√	√	√	√	√	√	√
2676	N/A									
2629	N/A									
2067	√	no	√	√	√	√	√	√	√	√
1067	N/A									
2062	√	√	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

152	N/A									
391	N/A									
1014	√	no	√	√	√	√	√	√	√	√
1113	√	√	√	√	√	√	√	√	√	√
1122	N/A									
1237	N/A									
1373	√	√	√	√	√	√	√	√	√	√
1399	√	√	√	√	√	√	√	√	√	√
2035	√	√	√	√	√	√	√	√	√	√
2064	√	√	√	√	√	√	√	√	√	√
2065	√	√	√	√	√	√	√	√	√	√
2082	Not	Rved								

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
267	N/A					
1970	√	√	N/A	√	√	√
1989	√	√	N/A	√	√	√
2676	N/A					
2629	N/A					
2067	√	√	no	√	no	√
1067	N/A					
2062	√	√	√	no	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

152	N/A					
391	N/A					
1014	√	√	√	√	√	√
1113	√	√	N/A	√	√	√
1122	N/A					
1237	N/A					
1373	√	√	√	√	√	√
1399	√	√	N/A	√	√	√
2035	√	√	N/A	√	√	√
2064	√	√	N/A	√	√	√
2065	√	√	N/A	√	√	√
2082	Not	Revd				